

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CLIFFORD F. TUTTLE, JR., et al.  
Consolidated with  
JOHN NICHOLAS, et al.

Plaintiffs,

V.

CITY OF HOUSTON, et al.

Defendants.



CASE NO. 4:21-CV-00270

# JURY DEMANDED

**CONSOLIDATED WITH**

JOHN NICHOLAS, as temporary  
Administrator of the Estate of Rhogena  
Nicholas and JO ANN NICHOLAS,  
individually and as an heir of the Estate  
of Rhogena Nicholas

Plaintiffs,

V.

CITY OF HOUSTON, et al.

Defendants.

**DEFENDANT FELIPE GALLEGOS’S NOTICE OF JOINDER OF DEFENDANT CITY  
OF HOUSTON’S PROPOSED JURY CHARGE [Dkt. No. 382];  
DEFENDANTS ASHRAF, GONZALES, LOVINGS, MEDINA, PARDO, REYNA,  
SALAZAR, SEPOLIO, AND WOODS, OBJECTIONS TO EXHIBITS [Dkt No. 394]; and  
DEFENDANT CITY OF HOUSTON’S MOTION IN LIMINE [Dkt. No. 364]**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Defendant Felipe Gallegos files this Notice of Joinder of the following pretrial filings:

1. Defendant City of Houston's Proposed Jury Charge [Dkt. No. 382];
2. Defendants Ashraf, Gonzales, Lovings, Medina, Pardo, Reyna, Salazar, Sepolio, and Wood's, Objections to Exhibits [Dkt. 394]; and

3. Defendant City of Houston's Motion in Limine [Dkt. 364].

Defendant Gallegos respectfully joins and adopts these pretrial filings for all purposes.

Respectfully submitted,

/s/ Russell Hardin, Jr.

Russell Hardin, Jr.

*Attorney-in-Charge*

Texas State Bar No. 08972800

Southern District of Texas No. 19424

Email: rhardin@rustyhardin.com

OF COUNSEL:

RUSTY HARDIN & ASSOCIATES, LLP

Marshall Douglas Murphy (Of Counsel to the Firm)

State Bar No. 24013215

Federal I.D. No. 24254

Letitia D. Quinones (Of Counsel to the Firm)

State Bar No. 24008433

Federal I.D. No. 23722

John MacVane

State Bar No. 24085444

Federal I.D. No. 2209776

Jennifer Brevorka

State Bar No. 24082727

Federal I.D. No. 1725400

Federal I.D. No. 3290460

1401 McKinney Street, Suite 2250

Houston, Texas 77010

Telephone: (713) 652-9000

Facsimile: (713) 652-9800

Email: rhardin@rustyhardin.com

Email: dmurphy@rustyhardin.com

Email: lquinones@rustyhardin.com

Email: jmacvane@rustyhardin.com

Email: jbrevorka@rustyhardin.com

**ATTORNEYS FOR DEFENDANT  
FELIPE GALLEGOS**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2024, a true and correct copy of the foregoing and attached documents were delivered to all parties through their counsel(s) of record, in accordance with the Rules, via email and/or certified mail, return receipt requested, to the following:

Michael Patrick Doyle  
mdoyle@doylelawfirm.com  
Jeffrey I. Avery  
jeffavery@doylelawfirm.com  
Patrick M. Dennis  
Doyle LLP  
3401 Allen Parkway, Suite 100  
Houston, Texas 77019  
service@doylelawfirm.com

Michael T. Gallagher  
mike@gld-law.com  
L. Boyd Smith, Jr.  
bsmith@fld-law.com  
Pamela R. McLemore  
pamm@gld-law.com  
The Gallagher Law Firm  
2905 Sackett St  
Houston, TX 77098

Charles Bourque, Jr.  
St. Martin & Bourque  
315 Barrow St  
Houma, LA 70360  
cbourque@stmblaw.com

Dwayne Richard Day  
Attorney at Law  
3401 Allen Pkwy, Suite 100  
Houston, TX 77019  
Fax: 713-759-6930  
dday@ddaylaw.com

David Allen Nachtigall  
Attorney at Law, PLLC  
1545 Heights, Ste. 100  
Houston, TX 77008  
david@dntriallaw.com

Alistair B. Dawson  
adawson@beckredden.com Lena  
Elizabeth Silva  
lsilva@beckredden.com Garrett  
Scott Brawley  
gbrawley@beckredden.com Beck  
Redden LLP  
1221 McKinney, Ste 4500  
Houston, TX 77010

Harold Al Odom, III Odom  
Law Firm  
601 Sawyer, Suite 225  
Houston, TX 77007  
aodom@aodowlawfirm.com

Christy L. Martin  
christy.martin@houstontx.gov  
Melissa Azadeh  
melissa.azadeh@houstontx.gov  
Kelly Ann Dempsey  
kelly.dempsey@houstontx.gov  
Alexander E. Garcia  
alexander.garcia@houstontx.gov  
Michelle Charlene Taylor  
michelle.taylor2@houstontx.gov  
City of Houston  
900 Bagby St., 3<sup>rd</sup> Floor  
Houston, Texas 77002

/s/ John MacVane

John MacVane